

CIPRIANI & WERNER

A PROFESSIONAL CORPORATION

ATTORNEYS AT LAW

JESSICA M. HEINZ
jheinz@c-wlaw.com

450 Sentry Parkway, Suite 200
Blue Bell, PA 19422

A Mid-Atlantic Litigation Firm
Visit us online at
www.C-WLAW.com

Phone: (610) 567-0700
Fax: (610) 567-0712
www.C-WLAW.com

September 19, 2019

VIA FACSIMILE (856-757-5355)

Hon. Robert B. Kugler
United States District Court
for the District of New Jersey
U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

Hon. Joel Schneider
United States District Court
for the District of New Jersey
U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

**RE: *In re Valsartan Products Liability Litigation*
No. 1:19-md-02875-RBK-JS (D.N.J.)**

Dear Judge Kugler and Magistrate Judge Schneider:

I represent Defendants Aurobindo Pharma USA, Inc. (“Aurobindo USA”) and Aurolife Pharma LLC (“Aurolife”) in MDL 2875. I submit this letter to Your Honors with the consent of counsel for Plaintiffs and Hetero USA, Inc. in support of their joint request to modify dates in Case Management Order No. 12 (“CMO-12”).

On September 9, 2019, Plaintiffs counsel contacted defense counsel requesting an extension to serve the Rule 30(b)(6) notices through the close of business on September 10, 2019. The Parties (Plaintiffs, Aurobindo USA, Aurolife, and Hetero USA, Inc.) were able to reach an agreement to extend all deadlines in Paragraph 2 of CMO-12. Based on that agreement, we submit this joint request that all deadlines in Paragraph 2 of CMO-12 be modified to read as follows:

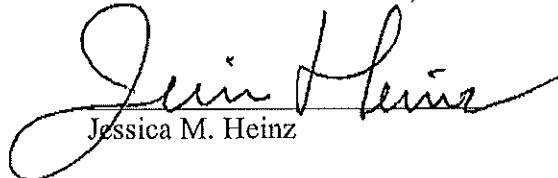
The deposition notices shall be served by **September 10, 2019**. Any objections shall be served by **October 4, 2019**. Any disputes shall be presented to the Court to be decided at the **October 9, 2019** teleconference. The noticed depositions shall be taken before **November 8, 2019**. Plaintiffs are granted leave to file motions to compel discovery, to be filed no later than **November 22, 2019**.

Hon. Robert B. Kugler
Hon. Joel Schneider
September 19, 2019
Page | 2 of 2

Thank you very much for your consideration.

Respectfully,

CIPRIANI & WERNER, P.C.



Jessica M. Heinz

cc: Adam M. Slater (via email)
Ruben Honik (via email)
Daniel A. Nigh (via email)
Conlee S. Whiteley (via email)
Seth A. Goldberg (via email)
Lori G. Cohen (via email)
Clem C. Trischler (via email)
Alexia Brancato (via email)
Jessica Priselac (via email)
Janet L. Poletto (via email)
Robert E. Blanton (via email)

So Ordered this 20th day
of September, 2019
Joel Schneider
JOEL SCHNEIDER, USMJ